

TI-905

Prepared: November 09, 2000

Short Description:

Obtaining Most Recent GSA Orders for ESA Phase I.

Inquiry:

Following are the caller's questions of October 23, 2000, regarding GSA regulations:

- 1) Is ADM 5910.1 the latest GSA Hazard Communication Program Order for Region 8? or
- 2) Has this Order been superceded with another GSA Order, which meets the intent of GSA Order ADM P 5940.1, Chapter 2, Paragraph 9 and 29 CFR 1910.1200?

Response:

Referencing of operating standards, inclusive of OSHA standards such as Hazcomm, are clearly outside the scope of a Phase I, since the contractor is contractually bound to follow the ASTM Phase I Standard relating to performance of Environmental Assessments.

This does not mean Region 8 does not review for compliance with OSHA standards (inclusive of Hazcomm), but this is done through internally performed Occupational Safety & Health (OSH) inspections.

It is important not to intermix inspections with different purposes - the Phase I's are being used to identify historical activities and use this information to determine if there is a potential for contamination existing on the property - it is not a review of current operating practices or compliance with any particular standard.

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